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November 12, 2024

VIA ECF

Honorable Gary R. Brown
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722-4451

RE: United States v. Naresh Deonarrain
21-CR-451 (GRB)

Dear Judge Brown:

INTRODUCTION

Mr. Naresh Deonarrain is before Your Honor for sentencing scheduled on November 15, 2024. The government has previewed to counsel previously that it intends to deviate from the Plea Agreement entered into by Mr. Deonarrain. As such, counsel makes a respectful application to the court for a modest adjournment of sentencing to a date and time convenient to the court three to four weeks into the future so counsel can further investigate the matter.

This application is made with the consent of A.U.S.A. Alessi and A.U.S.A. Wenzel.

Respectfully submitted,
s/ Joseph Kilada
Joseph F. Kilada
Attorney at Law